

State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

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Title V Operating Permit

PERMIT NUMBER: 3500261001

DATE OF PERMIT: July 20, 2001

Date of Last Revision: July 20, 2001

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Odin Investments Incorporated
958 W 3265 S
Salt Lake City, UT 84119-0000

Permitted Location:

Cast Polymer Manufacturing
660 West 3560 South
Salt Lake City, UT 84165-568

UTM coordinates: 4,505,000 meters Northing, 423,000 meters Easting

SIC code: 2821

ABSTRACT

Odin Investments, Inc. operates three facilities: Polymer Casting Plant, Fabri-Netics Plant, and Kitchen and Bath Plant. Polymer Casting Plant fabricates vanity tops, tubs, and the material for shower surroundings. Fabri-Netics Plant produces fiberglass-reinforced products. Kitchen and Bath Plant manufactures kitchen and bathroom counter tops and similar products. Odin Investments, Inc. is a major source of HAP emissions.

UTAH AIR QUALITY BOARD

By:

Prepared By:

Richard W. Sprott, Executive Secretary

Jennifer He

Operating Permit History

7/20/2001 - Permit issued	Action initiated by an initial operating permit application	
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Table of Contents

Section I: GENERAL PROVISIONS

I.A. Federal Enforcement.	Page 1
I.B. Permitted Activity(ies).	Page 1
I.C. Duty to Comply.	Page 1
I.D. Permit Expiration and Renewal.	Page 2
I.E. Application Shield.	Page 2
I.F. Severability.	Page 2
I.G. Permit Fee.	Page 2
I.H. No Property Rights.	Page 3
I.I. Revision Exception.	Page 3
I.J. Inspection and Entry.	Page 3
I.K. Certification.	Page 3
I.L. Compliance Certification.	Page 3
I.M. Permit Shield.	Page 4
I.N. Emergency Provision.	Page 5
I.O. Operational Flexibility.	Page 6
I.P. Off-permit Changes.	Page 6
I.Q. Administrative Permit Amendments.	Page 6
I.R. Permit Modifications.	Page 6
I.S. Records and Reporting.	Page 6
I.T. Reopening for Cause.	Page 7
I.U. Inventory Requirements.	Page 8

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.	Page 9
II.B. Requirements and limitations.	Page 9
Conditions on permitted source (Source-wide)	Page 9
Conditions on Cast Polymer Plant (Emission unit CPP)	Page 10
Conditions on Fabri-Netics Plant (Emission unit FNI)	Page 14
Conditions on Kitchen & Bath Plant (Emission unit KBI)	Page 15
II.C. Emissions Trading. (R307-415-6a(10))	Page 17
II.D. Alternative Operating Scenarios. (R307-415-6a(9))	Page 17

Section III: PERMIT SHIELD

III.A. A permit shield was not granted for any specific requirements.	Page 17
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Section IV: ACID RAIN PROVISIONS.

IV.A. This source is not subject to Title IV. This section is not applicable.	Page 17
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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

Section I: GENERAL PROVISIONS

I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C. Duty to Comply.

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records

required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. Permit Expiration and Renewal.

- I.D.1 **This permit is issued for a fixed term of five years and expires on July 20, 2006.**
(R307-415-6a(2))

- I.D.2 Application for renewal of this permit is due by January 20, 2006. An application may be submitted early for any reason. (R307-415-5a(1)(c))

- I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

- I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. Permit Fee.

- I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H. No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege.
(R307-415-6a(6)(d))

I.I. Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J. Inspection and Entry.

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit.
(R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit.
(R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K. Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L. Compliance Certification.

- I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than July 19, 2002 and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
- I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
- I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
EPA, Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

I.M. Permit Shield.

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))
- I.N. **Emergency Provision.**
- I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))
- I.O. **Operational Flexibility.**
- Operational flexibility is governed by R307-415-7d(1).
- I.P. **Off-permit Changes.**
- Off-permit changes are governed by R307-415-7d(2).
- I.Q. **Administrative Permit Amendments.**
- Administrative permit amendments are governed by R307-415-7e.
- I.R. **Permit Modifications.**
- Permit modifications are governed by R307-415-7f.
- I.S. **Records and Reporting.**
- I.S.1 Records.
- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.
- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.

- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:
- Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000
- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and
Environmental Justice (mail code 8ENF)
999 18th Street, Suite 300
Denver, CO 80202-2466

For reports, notifications, or other correspondence
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance
Air & Radiation Program (mail code 8P-AR)
999 18th Street, Suite 300
Denver, CO 80202-2466
Phone: 303-312-6440

I.T. Reopening for Cause.

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. Inventory Requirements.

I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

II.A.1 Cast Polymer Plant (designated as Emission unit CPP)

Unit Description: Fabrication of vanity tops, tubs, and the material for shower surroundings. Includes continuous resin mixing, gel coating booths w/arrestor particulate filters, gel coat custom shop, gel coat spray guns, fiberglass chopper gun w/injector.

II.A.2 Fabri-Netics Plant (designated as Emission unit FNI)

Unit Description: Produces fiberglass-reinforced products. Includes miscellaneous spray guns, grinding room, carpentry shop, spray room, electric curing oven, and miscellaneous welding equipment.

II.A.3 Kitchen & Bath Plant (designated as Emission unit KBI)

Unit Description: Produces cast polymer products. Includes marblematic pot washer, vacuum mixer, marble mixer, gel coat room, electric curing oven, belt sander, chop saw, table saw, space heater, Torit dust collector, welding equipment, and miscellaneous hand tools.

II.B. Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 Conditions on permitted source (Source-wide):

II.B.1.a At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5; condition originated in DAQE-955-99, DAQE-956-99, DAQE-957-99]

II.B.1.a.1 Monitoring: Records required for this permit condition will serve as monitoring.

II.B.1.a.2 Recordkeeping: Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.a.3 Reporting: There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR 82]

II.B.1.b.1 Monitoring: The permittee shall certify, in the annual compliance statement required in

Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

- II.B.1.b.2 **Recordkeeping:** All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.
- II.B.1.b.3 **Reporting:** All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.c The permittee shall comply with the applicable requirements for servicing of motor vehicle air conditioners pursuant to 40 CFR 82, Subpart B - Servicing of Motor Vehicle Air Conditioners. [Authority granted under 40 CFR 82.30(b); condition originated in 40 CFR 82]

- II.B.1.c.1 **Monitoring:** The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart B.
- II.B.1.c.2 **Recordkeeping:** All records required in 40 CFR 82, Subpart B shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.
- II.B.1.c.3 **Reporting:** All reports required in 40 CFR 82, Subpart B shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.2 **Conditions on Cast Polymer Plant (Emission unit CPP):**

II.B.2.a Visible emissions shall be not greater than 5 percent opacity from any stationary point or fugitive emission source associated with plant or with the control facilities. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-956-99]

- II.B.2.a.1 **Monitoring:** A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for point sources, and in accordance 58 FR 61640 Method 203A for fugitive sources.
- II.B.2.a.2 **Recordkeeping:** A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 or 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.
- II.B.2.a.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.b Consumption of propane shall be not greater than 3,120 gallons per rolling 12-month period.

[Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-956-99]

- II.B.2.b.1 **Monitoring:** Consumption shall be determined within the first 15 calendar days of each month, for the previous month, using purchase records and inventory information. The total shall then be added to the previous 11 months total for a 12 month rolling total. Any adjustments to the total shall be fully explained and justified.
- II.B.2.b.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.2.b.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.c Consumption of Gel Coats shall be not greater than 195.5 tons per rolling 12-month period. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-956-99]

- II.B.2.c.1 **Monitoring:** Consumption shall be determined within the first 15 calendar days of each month, for the previous month, using purchase records and inventory information. The total shall then be added to the previous 11 months total for a 12 month rolling total. Any adjustments to the total shall be fully explained and justified.
- II.B.2.c.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.2.c.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.d The plant-wide emissions of VOCs and HAPs from the Cast Polymer Plant shall not exceed:

79.214 tons per rolling 12-month period for VOCs

98.354 tons per rolling 12-month period for HAPs

HAPs marked with an * are included in the VOC calculation.

*12.2 tons/yr of methyl methacrylate

*62 tons/yr of styrene

*4.04 tons/yr of toluene

*720 lbs/yr of xylene

*560 lbs/yr of cumene

*340 lbs/yr of MEK

*400 lbs/yr of dimethyl phthalate

19.14 tons/yr of methylene chloride. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-956-99]

- II.B.2.d.1 **Monitoring:** Emissions shall be calculated on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 14 days after the end of each calendar month.
- II.B.2.d.2 **Recordkeeping:** The VOCs and HAPs emissions shall be determined by maintaining a record

of VOC potential and HAP potential contained in materials used each month. The record shall include the following data for each item used:

A. Name of the VOC and HAPs emitting material, such as: resin, gel coat, catalysts, solvent, release, etc.

B. Density of each material used (pounds per gallon).

C. Percent by weight of all VOC potential and HAP potential for each individual material. The percent by weight of the VOC and HAP potentials can be obtained from the manufacturers' MSDSs. The owner/operator can obtain MSDS data from the manufacturers of the materials and retain the information on-site.

D. Amount of materials containing VOCs and HAPs used on a monthly basis.

E. To calculate the above potentials contained in the material, use the following procedure:

Styrene:

From Resin, Marble Casting

Styrene = (production rate lbs/year)(emission factor for marble casting)(1 ton/2000 lbs)

From Gel Coats and Resin Spray

Styrene = (production rate lbs/yr)[emission factor for spray layup][percent gel coat or resin applied]

Other HAPS and VOC

For Gel Coats, Solvents and Releases

$$\text{HAP/VOC} = \{ [\% \text{ Volatile or HAP by Weight}] / 100 \} \times [\text{Density (lb/gal)}] \times [\text{Gal used}] \times [1 \text{ ton}/2000\text{lb}]$$

For Resins and Catalysts

$$\text{HAP/VOC} = \{ [\% \text{ Volatile or HAP by Weight}] / 100 \} \times [.0081] \times [\text{Density (lb/gal)}] \times [\text{Gal used}] \times [1 \text{ ton}/2000\text{lb}]$$

F. The total amount of VOC and HAP emitted monthly from all materials used

G. The amount of VOC content potential (potential air emissions) and HAP potential (potential air emissions) in pounds contained in materials deposited as solid or hazardous waste for the month may be quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAP emissions.

II.B.2.d.3	Reporting:	There are no reporting requirements for this provision except those specified in Section I of this permit.
II.B.2.e		All air exiting the gel coating booth shall pass through paint arrestor particulate filters before being vented to the atmosphere. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-956-99]
II.B.2.e.1	Monitoring:	Visual inspections shall be made daily by a shift supervisor to determine compliance with this condition.
II.B.2.e.2	Recordkeeping:	Records of inspections shall be maintained as described in I.S.1 of this permit.
II.B.2.e.3	Reporting:	There are no reporting requirements for this provision except those specified in Section I of this permit.
II.B.2.f		<p>The plant-wide emissions of VOCs and HAPs from the Fabri-Netics Plant shall not exceed:</p> <p>6.0 tons per rolling 12-month period for VOCs (all HAPs)</p> <p>4.98 tons/yr of styrene 0.194 tons/yr of toluene 0.004 tons/yr of xylene 0.004 tons/yr of cumene 0.072 tons/yr of MEK 0.64 tons/yr of methyl methacrylate 0.07 tons/year of dimethyl phthalate 0.03 tons/yr of vinyl acetate monomer. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-956-99]</p>
II.B.2.f.1	Monitoring:	Emissions shall be calculated on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 14 days after the end of each calendar month.
II.B.2.f.2	Recordkeeping:	<p>The VOCs and HAPs emissions shall be determined by maintaining a record of VOC potential and HAP potential contained in materials used each month. The record shall include the following data for each item used:</p> <p>A. Name of the VOC and HAPs emitting material, such as: resin, gel coat, catalysts, solvent, release, etc.</p> <p>B. Density of each material used (pounds per gallon).</p> <p>C. Percent by weight of all VOC potential and HAP potential for each individual material. The percent by weight of the VOC and HAP potentials can be obtained from the manufacturers' MSDSs. The owner/operator can obtain MSDS data from the manufacturers of the materials and retain the information on-site.</p>

D. Amount of materials containing VOCs and HAPs used on a monthly basis.

E. To calculate the above potentials contained in the material, use the following procedure:

Styrene:

From Polyester Resin

Styrene = (production rate lbs/year)[(emission factor for spray layup)(% spray layup) + (emission factor for hand layup)(% hand layup)](1 ton/2000 lbs)

From Gel Coats

Styrene = (production rate lbs/yr)(emission factor for spray layup)(percent gel coat applied by spray layup)(1 ton/2000 lbs)

Other HAPS and VOC

For Gel Coats, Solvents and Releases

HAP/VOC = { [% Volatile or HAP by Weight]/100 } x [Density (lb/gal)] x [Gal used] x [1 ton/2000lb]

For Resins and Catalysts

HAP/VOC = { [% Volatile or HAP by Weight]/100 } x [.0081] x [Density (lb/gal)] x [Gal used] x [1 ton/2000lb]

F. The total amount of VOC and HAP emitted monthly from all materials used

G. The amount of VOC content potential (potential air emissions) and HAP potential (potential air emissions) in pounds contained in materials deposited as solid or hazardous waste for the month may be quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAP emissions.

II.B.2.f.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3 **Conditions on Fabri-Netics Plant (Emission unit FNI):**

II.B.3.a Visible emissions shall be not greater than 5 percent opacity from any stationary point or fugitive emission source associated with plant or with the control facilities. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-955-99]

II.B.3.a.1 **Monitoring:** A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity

determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for point sources, and in accordance 58 FR 61640 Method 203A for fugitive sources.

II.B.3.a.2 **Recordkeeping:** A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 or 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.3.a.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4 **Conditions on Kitchen & Bath Plant (Emission unit KBI):**

II.B.4.a The plant-wide emissions of VOCs and HAPs from the Kitchen & Bath Plant shall not exceed:

7.5 tons per rolling 12-month period for VOCs (all HAPs)

5.05 tons/yr of styrene

1.2 tons/yr of toluene

0.105 tons/yr of xylene

0.084 tons/yr of cumene

0.013 tons/yr of MEK

1 tons/yr of methyl methacrylate

0.019 tons/yr of dimethyl phthalate. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-957-99]

II.B.4.a.1 **Monitoring:** Emissions shall be calculated on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 14 days after the end of each calendar month.

II.B.4.a.2 **Recordkeeping:** The VOCs and HAPs emissions shall be determined by maintaining a record of VOC potential and HAP potential contained in materials used each month. The record shall include the following data for each item used:

A. Name of the VOC and HAPs emitting material, such as: resin, gel coat, catalysts, solvent, release, etc.

B. Density of each material used (pounds per gallon).

C. Percent by weight of all VOC potential and HAP potential for each individual material. The percent by weight of the VOC and HAP potentials can be obtained from the manufacturers' MSDSs. The owner/operator can obtain MSDS data from the manufacturers of the materials and retain the information on-site.

D. Amount of materials containing VOCs and HAPs used on a monthly basis.

E. To calculate the above potentials contained in the material, use the following procedure:

Styrene:

From Resin, Marble Casting

Styrene = (production rate lbs/year)(emission factor for marble casting)(1 ton/2000 lbs)

From Gel Coats and Resin Spray

Styrene = (production rate lbs/yr)[emission factor for spray layup][percent gel coat or resin applied]

Other HAPS and VOC

For Gel Coats, Solvents and Releases

HAP/VOC = {[% Volatile or HAP by Weight]/100} x [Density (lb/gal)] x [Gal used] x [1 ton/2000lb]

For Resins and Catalysts

HAP/VOC = {[% Volatile or HAP by Weight]/100} x [.0081] x [Density (lb/gal)] x [Gal used] x [1 ton/2000lb]

F. The total amount of VOC and HAP emitted monthly from all materials used

G. The amount of VOC content potential (potential air emissions) and HAP potential (potential air emissions) in pounds contained in materials deposited as solid or hazardous waste for the month may be quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAP emissions.

II.B.4.a.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4.b Visible emissions shall be not greater than 5 percent opacity from any stationary point or fugitive emission source associated with plant or with the control facilities. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-957-99]

II.B.4.b.1 **Monitoring:** A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for

point sources, and in accordance 58 FR 61640 Method 203A for fugitive sources.

II.B.4.b.2 **Recordkeeping:** A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 or 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.4.b.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C. **Emissions Trading.** (R307-415-6a(10))
Not applicable to this source.

II.D. **Alternative Operating Scenarios.** (R307-415-6a(9))
Not applicable to this source.

Section III: PERMIT SHIELD

III.A. A permit shield was not granted for any specific requirements.

Section IV: ACID RAIN PROVISIONS.

IV.A. This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-957-99	dated	December 06, 1999
DAQE-956-99	dated	December 06, 1999
DAQE-955-99	dated	December 06, 1999

1: Comment on an item originating in DAQE-955-99, DAQE-956-99, DAQE-957-99 regarding permitted source (Source-wide):

Condition 7.D of DAQE-955-99, 957-99, condition 10.D of DAQE-956-99: Calculation formula for HAPs/VOC emissions from resins and catalysts: The percentages of the HAPs/VOC in these compounds have been multiplied by 0.81% (as defined in the Approval Orders) to account for the amount of compound that is bound chemically in the product and does not evaporate, as per a letter from the manufacturer. [Comment last updated on 4/16/2001]

2: Comment on an item originating in QUESTION regarding permitted source (Source-wide):

Odin Investment Inc. is considered one source with respect to the Utah Operatin Permits Porgram: Polymer Casting Plant, Fabri-Netics Plant, and Kitchen & Bath Plant meet all of the following criteria to be considered as one major source: 1) Located on one or more contiguous or adjacent properties, 2) Under common control, and 3) Belong to a single major industrial grouping (have same two-digit SIC code). [Comment last updated on 7/20/2001]